

**FBFG**

**Finkelstein, Blankinship,  
Frei-Pearson & Garber, LLP**

1 NORTH BROADWAY, SUITE 900  
WHITE PLAINS, NY 10601  
Phone: (914) 298-3281  
Fax: (845) 562-3492  
www.fbfglaw.com

**BY ECF**

Honorable Philip M. Halpern  
United States District Judge  
The Hon. Charles L. Brieant, Jr.  
Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601

Application granted.

SO ORDERED.

  
Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
January 6, 2023

**Re: Lowell, et al. v. Lyft, Inc., No. 7:17-cv-06251-PMH-AEK (S.D.N.Y.)**

Dear Judge Halpern,

We represent Plaintiffs Harriet Lowell and Westchester Disabled on the Move, Inc. (collectively, the “Plaintiffs”) in the above-referenced action. We write to respectfully request a two-week extension to the deadline to file the Proposed Joint Pretrial Order from January 13, 2023, to January 27, 2023.

Pursuant to Your Honor’s December 13, 2022, Order, ECF No. 336, Plaintiffs and Defendant Lyft, Inc. (collectively, the “Parties”), were directed to file a revised Proposed Joint Pretrial Order to the Court by January 13, 2023. Given that Magistrate Judge Krause’s Report and Recommendation granting in part Plaintiffs’ motion for class certification, ECF No. 340, was issued on December 22, 2022, Plaintiffs require more time to communicate with potential witnesses, finalize their witness list, and revise the Proposed Joint Pretrial Order. Accordingly, Plaintiffs respectfully request that the Court extend the deadline to file the Parties’ Proposed Joint Pretrial Order from January 13, 2023, to January 27, 2023.

Plaintiffs have conferred with Defendant, who consents to the requested extension.

Plaintiffs thank the Court for its continued attention to this matter.

Respectfully submitted,

By: s/ Jeremiah Frei-Pearson

Jeremiah Frei-Pearson

**FINKELSTEIN, BLANKINSHIP,  
FREI-PEARSON & GARBER, LLP**

1 North Broadway, Suite 900  
White Plains, New York 10601

Tel: (914) 298-3281

Fax: (914) 824-1561

jfrei-pearson@fbfglaw.com